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District of Hawaii

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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,)	CRIM. NO. 05-0300JMS-01
)	
Plaintiff,)	MOTION FOR DOWNWARD DEPARTURE
)	IN SENTENCING DEFENDANT
VS.)	(LEANDRO GOMEZ, III)
)	
LEANDRO GOMEZ, III, also (01))	
known as "Leo",)	
NATHANIEL RUSSELL, also (02))	
known as "Bobo" or "Bo",)	
PAMELA MAHEALANI NEWTON, (03))	
JOHN CORNIEL, JR., (04))	
CYRINAH L. AKEN, also (05))	
known as "Cyrinah L.)	
Solomon",)	
CHARLES R.K. FARREN, (06))	
REED KALEOOKALANI AKEN, (07))	Sentencing date: 9/18/06 at
SENIOR,)	2:15 p.m., before the Hon.
ROGER MANU BATES, also (08))	J. Michael Seabright, U.S.
known as "Manu",)	District Judge
TIMOTHY JAMES SULLIVAN, (09))	
also known as "Tim",)	
GILBERT GOMEZ, also (10))	
known as "Glen",)	
)	
Defendants.)	
)	

MOTION FOR DOWNWARD DEPARTURE
IN SENTENCING DEFENDANT
[LEANDRO GOMEZ, III]

The United States of America, by and through its undersigned counsel, hereby moves this Honorable Court to depart downwards in

imposing sentence upon defendant above-named, due to his substantial assistance to and cooperation with law enforcement authorities in the investigation or prosecution of other persons who have committed an offense.

This motion is made pursuant to U.S. Sentencing Commission Guideline 5K1.1, and is based upon the information contained in the sealed "Factual Basis for Motion for Departure Downward in Sentencing Defendant", filed concurrently herewith.

DATED: Honolulu, Hawaii, August 22, 2006.

EDWARD H. KUBO, JR.
United States Attorney
District of Hawaii

By /s/ Michael K. Kawahara
MICHAEL K. KAWAHARA
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

I hereby certify that, on the dates and by the methods of service noted below, a true and correct copy of the foregoing was served on the following at their last known addresses:

Served by First Class Mail:

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Served by hand-delivery:

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/s/ Rowena N. Kang